



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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May 15, 2015

Beth ~~Sheldrick~~ *Sheldrake*
U.S. EPA Region 10
1200 6th Ave, Suite 900
Seattle WA, 98101

RE: Wyckoff Eagle Harbor Superfund Site Preferred Alternative(s).

Dear Ms. ~~Sheldrick~~: *Sheldrake*

The Department of Ecology (Ecology) has been involved in the development of cleanup alternatives for the Wyckoff Eagle Harbor Superfund Site, and reviewed the proposed alternatives. Ecology also participated in the National Remedy Review Board meeting, and reviewed the Board's recommendations for the Wyckoff Eagle Harbor Superfund Site Preferred Alternative(s).

Ecology is in general agreement with Alternative 7 for the upland portion of the Site, and Alternative 3 for in-water portion of the site, with the understanding that more refinement is needed for both alternatives. Ecology recommends that EPA develop options to accelerate the remedial design schedule so that Ecology can ensure funding the operation of the water treatment plant until remedy construction begins and EPA can assume operation of the plant. In addition, Ecology has the following comments to offer in regard to the alternatives:

Upland

Ecology is acceptable to Alternative 7 (phase 1 concrete stabilization with phase 2 adaptive management) as presented to the National Remedy Review Board, providing Ecology's concerns, which are similar to concerns expressed by the NRRB, are addressed by EPA. These concerns are:

- Further development and refinement of Phase 1 and Phase 2 costs should be completed
- Remedial time frames for Phase 1 and Phase 2 should be specified
- Site conditions triggering Phase 2, after the completion of Phase 1 should be developed
- Improve upon the summary of Phase 2 adaptive management remedial alternatives
- Active and/or passive treatment of dissolved phase contaminants discharging to Eagle Harbor should be further evaluated

- Substantial reduction of long-term O&M costs will be necessary to ensure the state's ability to implement O&M into the future
- O&M requirements including data collection in support of EPA's Five-Year Review should be outlined.
- Operational and Functional Criteria for Phase 1 in the event that Phase 2 is considered not necessary by EPA.
- Operational and Functional Criteria for Phase 2 likely will be needed.

North Shoal and East Beach (In water portion of the site)

Ecology is in general agreement with EPA on the selection of Alternative 3 (sediment excavation and inset capping). Ecology's concerns and comments pertaining to Alternative 3 are:

- The O&M requirements and costs will need to be further refined
- Cap design modifications to effect longer cap life therefore reducing O&M costs should be evaluated
- Evaluation of cap design modifications allowing for easier/cheaper cap replacement should be completed
- Evaluate options for O&M cap replacement staging area after the upland park is developed
- O&M requirements including data collection in support of EPA's Five-Year Review
- Develop Operational and Functional Criteria

Ecology appreciates the good working relationship we have experienced with EPA over the past several years on this project, and looks forward to completing the Proposed Plan in the near future. If you have questions regarding this please contact me at (360) 407-7226.

Sincerely,



Barry Rogowski
Manager
HQ Cleanup Section